



IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

IAN LUCAS,	)	
	)	
Plaintiff,	)	No. 3:24-cv-01359
	)	
v.	)	Judge Richardson
	)	
VANDERBILT UNIVERSITY, and	)	Magistrate Judge Frensley
VANDERBILT UNIVERSITY SCHOOL	)	
OF NURSING.	)	
	)	
Defendants.	)	

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**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME**

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Pursuant to Fed. R. Civ. P. 6(b)(1), Defendants Vanderbilt University and Vanderbilt University School Of Nursing (together "Vanderbilt") move the Court for a one month extension to file an Answer or otherwise respond to Plaintiff's Complaint. In support of this Motion, Vanderbilt states as follows:

1. Plaintiff filed his Complaint under seal in the Davidson County Circuit Court on October 6, 2024.
2. Vanderbilt was served with a copy of the Complaint on October 17, 2024.
3. On November 15, 2024, Vanderbilt filed a Notice of Removal pursuant to 28 U.S.C. §§ 1331, 1441, and 1446.
4. Pursuant to Fed. R. Civ. P. 81(c) Vanderbilt's deadline to Answer or otherwise respond to Plaintiff's Complaint on Friday, November 21, 2024.
5. Counsel for Vanderbilt is in the process of completing their due diligence in investigating the allegations in the Complaint.

6. Vanderbilt's counsel contacted Plaintiff about the requested extension and was advised that Plaintiff does not oppose Defendant's request.

Accordingly, Vanderbilt respectfully requests that its responsive pleading deadline be extended to December 23, 2024.

Respectfully submitted,



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Kevin C. Klein, BPR No. 023301  
Matthew "JP" Horton II, BPR No. 038247  
Klein Solomon Mills, PLLC  
1322 4<sup>th</sup> Avenue North  
Nashville, TN 37208  
Phone: (615) 600-4802  
[kevin.klein@kleinpllc.com](mailto:kevin.klein@kleinpllc.com)  
[jp.horton@kleinpllc.com](mailto:jp.horton@kleinpllc.com)

*Attorneys for Vanderbilt*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing MOTION FOR EXTENSION OF TIME has been sent via e-mail to the following individuals on November 21, 2024:

Ian Lucas  
PMB 61 Elizabethtown  
North Carolina, 28337  
ian.h.lucas@protonmail.com

*Plaintiff Pro Se*

A handwritten signature in black ink, appearing to read "Matthew 'JP' Horton II", is written above a horizontal line.

Matthew "JP" Horton II